



City of Chattanooga
DEPARTMENT OF PUBLIC WORKS
DEVELOPMENT RESOURCE CENTER
ENGINEERING DIVISION
1250 MARKET STREET, SUITE 2100
Chattanooga, Tennessee 37402-2713

March 3, 2014

Certified Mail: 7012 0470 0000 7825 0085

Lauren Holcomb
Mueller Company
1401 Mueller Avenue
Chattanooga, TN 37406-1397

**Re: Written Warning
NPDES/Stormwater Compliance Inspection
NPDES TMSP#TNR051467**

Dear Mrs. Holcomb:

Enclosed is the report from the Industrial Stormwater Inspection which was conducted by Mitch Underwood (City of Chattanooga Water Quality Program staff) and Michael Bascom (Tennessee Department of Environment and Conservation staff) at your facility on February 19, 2014. Mueller Company is currently operating under SIC 3321. Annual analytical stormwater sampling and quarterly visual examination of stormwater runoff are both required under this code. In the 2012 annual stormwater monitoring report, Magnesium, Aluminum and Iron all surpassed the established benchmarks. For 2013 annual stormwater monitoring report, Magnesium was the only element that exceeded the benchmark.

The Water Quality Program (WQP) requests Mueller to conduct stormwater sampling in baghouse collection areas to determine if these areas are contributing to exceedances in the benchmarks. Also, the WQP requests that these sampling documents to be copied to our office for evaluation.

The SWPPP and site map are both currently in the process of being updated to reflect the additional drainage conveyances to the retention pond. These documents will be submitted to the Water Quality Department once available. All other NPDES related paperwork was found to be in good order.

The following **infractions were** observed at this facility:

- Drums and other liquid container are not being stored properly. One was observed collecting stormwater runoff.
- General housekeeping around the facility needs some improvement. The pavement in several areas around the baghouse collectors were found with excessive accumulation of dust.
- Hazardous Waste collection vessel has a defective covering mechanism to prevent contact with stormwater runoff.
- Two used oil collection vessels must have some form of secondary containment.

- Some Styrofoam pellets were observed on the pavement in northeast corner of the property.
- Stormwater controls (filter socks) are in need of maintenance around **Outfall #1**. Properly functioning BMPs will help prevent any excess sediment or foundry sand runoff from facility from entering South Chickamauga Creek.

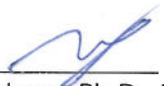
Required Corrective Actions:

- **Within 30 days** from receiving this letter:
 - Develop a **Corrective Action Plan** that will address the issues mentioned in this Written Warning letter. The plan shall be submitted to this office within 30 days of receiving this letter.
 - Implement a dredging schedule on retention pond and surrounding drainage conveyances to prevent excessive accumulation of the foundry sand.

Failure to respond to this **Written Warning** or failure to take the proper required actions would result in enforcement actions such as civil penalty and/or court citation.

Please address any questions you have regarding this inspection to **Mitch Underwood** at **(423) 643-5871** or via electronic mail at: underwood_m@chattanooga.gov.

Sincerely,


Mounir Minkard, Ph.D., P.E.
Water Quality Manager


Mitch Underwood
Water Quality Specialist II

CC:

Ms. Jennifer Innes, Tennessee Department of Environment and Conservation, Division of Water Pollution Control, 540 McCallie Avenue, Chattanooga, TN 37403



Fig 1. Poor Housekeeping Measures



Fig 2. Poor Housekeeping Measures



Fig 3. Poor Housekeeping Measures



Fig 4. Hazardous Waste Vessel- Ripped Tarp



Fig 5. Used oil containers- No secondary containment

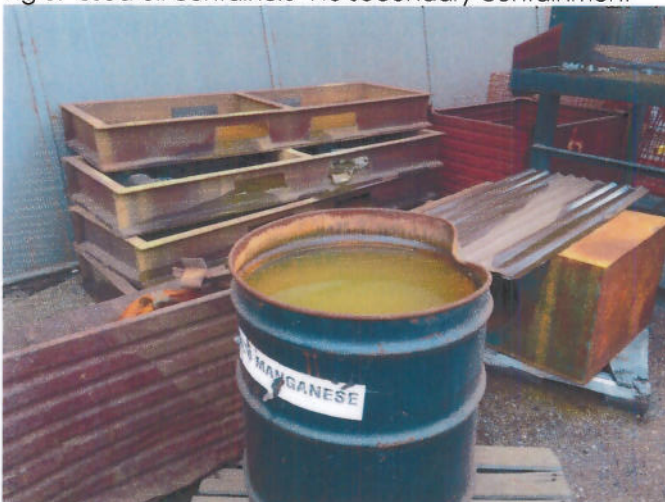


Fig 6. Drum collecting stormwater runoff



Fig 7. Retention Pond



Fig 8. Retention Pond drainage conveyance- sand accumulation



Fig 9. Retention Pond primary drainage conveyance- sand accumulation

Photos taken by Mitch Underwood on 2/19/2014



Fig 10. Stormwater Controls in need of maintenance at **Outfall #1**

Photo taken by Michael Bascom (TDEC) on 2/19/2014



Fig 11. Aerial photo map depicting stormwater controls and material storage